FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT and INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Visteon Automotive Systems
6900 English Avenue
Indianapolis, Indiana 46219

Visteon Automotive Systems (herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-6964-00021	
Issued by: Robert F. Holm, PhD, Administrator Environmental Resources Management Division	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the City of Indianapolis Environmental Resources Management Division. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary source relating to the operation of a motor vehicle parts and accessories manufacturing operation under a Standard Industrial Classification (SIC) Code number of 3714 - Steering mechanisms, motor vehicle.

Authorized individual:	Mr. Juergen Weber
Source Address:	6900 English Avenue, Indianapolis, Indiana 46219
Mailing Address:	6900 English Avenue, Indianapolis, Indiana 46219
Phone Number:	Mr. Tom Kolbus (317) 352-4301
SIC Code:	3714
County Location:	Marion County
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) Keeler boiler serial number 13160-1 identified as Emission Unit ID B2 with a maximum rated heat input capacity of 146.0 million Btu per hour firing natural gas or # 2 fuel oil. Emission Unit ID B2 exhausts at Stack/Vent ID BS2. Installation date of 1957.

(b) One (1) Keeler boiler serial number 13160-2 identified as Emission Unit ID B3 with a maximum rated heat input capacity of 146.0 million Btu per hour firing natural gas or # 2 fuel oil. Emission Unit ID B3 exhausts at Stack/Vent ID BS3. Installation date of 1957.

(c) Seven (7) Piston Grinders for piston finishing, serial numbers BT-123315, BT-123314, BT-123949, BT-123317, BT-123312, BT-139533 and BT-141598, identified as Emission Unit ID PFG 1-7. Steering gear pistons are polished by wet grinding. The interface of the grinding is flooded with machining oils to cool and lubricate the grinding surface. The machining oil is reclaimed and recycled. The seven (7) grinders are exhausted to either one of two (2) Kirk and Blum oil demisters identified as Control Equipment ID CE PFG 1 & 2 and exhausting at Stack/Vent ID PE-JJ9-1 and PE-JJ9-2. Each demister has 60 ft^2 of face area to remove oil mist drops from the air stream. Rated exhaust air flow rate 6000 acfm for each demister. Installation date of 1957.

(d) Cold cleaning dip tanks throughout the source identified as Emission Unit ID Mineral Spirits Usage. Annual consumption of mineral spirits throughout the plant is rated at 49.0 tons of mineral spirits per year. Installation date of 1957.

(e) Emission Unit ID Plant Wide Miscellaneous Machining in plant wide miscellaneous machining where an aqueous cutting coolant continuously floods the machining interface. Includes plant wide miscellaneous machining in Emission Unit ID's HG-MACH, PC-MACH, PC-PMACH, PH-GRIND, YA-TAURUS and ZeroUse. Installation date of 1957.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

1) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
2) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
3) The following VOC and HAP storage containers:
   A) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
4) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
6) Cleaners and solvents characterized as follows:
   A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
   B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

   the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
7) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
8) Closed loop heating and cooling systems.
9) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
10) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
11) Noncontact cooling tower systems with either of the following:
   A) Forced and induced draft cooling tower system not regulated under a NESHAP.
12) Quenching operations used with heat treating processes.
13) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
14) Heat exchanger cleaning and repair.
15) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
16) Paved and unpaved roads and parking lots with public access.
17) Asbestos abatement projects regulated by 326 IAC 14-10.
18) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
19) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
20) Stationary fire pumps. Three (3) Stationary Fire Pumps identified as Emission Unit ID SFP1,

SFP2 and SFP3. Each stationary fire pump is a reciprocating internal combustion engine fired with diesel fuel. Emission Unit ID SFP1 is rated at 240 horsepower and SFP2 and SFP3 are each rated at 265 horsepower. Installation date of 1957.

21) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

22) A laboratory as defined in 326 IAC 2-7-1(20)(C).

23) Natural gas fired combustion sources identified as heat treating units with maximum heat input capacity of any individual heat treating unit equal to or less than ten (10) million Btu per hour. Combined plant wide heat treating units capacity is 16.7 million Btu per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the City of Indianapolis Environmental Resources Management Division (ERMD) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM and ERMD shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

(c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by ERMD.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue

Indianapolis, Indiana 46221

(b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and/or ERMD may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and ERMD may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management

Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM and ERMD may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. IDEM, OAM, and ERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM and ERMD, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

ERMD
Telephone No.: 317-327-2234
Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall

constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B.14 - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and ERMD determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM and ERMD, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and ERMD and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

(2) If IDEM, OAM and ERMD upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and ERMD takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM and ERMD, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, and ERMD, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the

property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Asbestos
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, and ERMD if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. All

monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted a written emergency reduction plan (ERPs) consistent with safe operating procedures on August 4, 1993 with an update received June 29, 1999.

(b) If the ERP is disapproved by IDEM, OAM and ERMD, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM and ERMD that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold

quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall

constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C.9 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement

Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and ERMD on or before the date it is due.

C.17 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C.9-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and/or ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyzes were performed;

(3) The company or entity performing the analyzes;

(4) The analytic techniques or methods used;

(5) The results of such analyzes; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C.14 - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and ERMD on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does(do) not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B.15-Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Emission Unit ID B2 Keeler Boiler #2	**Facility Description [326 IAC 2-8-4(10)]:** One (1) Keeler boiler serial number 13160-1 identified as Emission Unit ID B2 with a maximum rated heat input capacity of 146.0 million Btu per hour firing natural gas or # 2 fuel oil. Emission Unit ID B2 exhausts at Stack/Vent ID BS2. Installation date of 1957. (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)
Emission Unit ID B3 Keeler Boiler #3	**Facility Description [326 IAC 2-8-4(10)]:** One (1) Keeler boiler serial number 13160-2 identified as Emission Unit ID B3 with a maximum rated heat input capacity of 146.0 million Btu per hour firing natural gas or # 2 fuel oil. Emission Unit ID B3 exhausts at Stack/Vent ID BS3. Installation date of 1957. (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-12]

Pursuant to 326 IAC 6-1-12 (Particulate Rules: Marion County), PM emissions from Emission Unit ID B2 and B3 each shall not exceed the following emission limit(s):

Emission Unit	pounds per million Btu	tons per year
Boiler # 2 (Emission Unit ID B2)	0.27	55.1
Boiler # 3 (Emission Unit ID B3)	0.27	38.6

D.1.2 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-2][326 IAC 2-8-4]

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations) and 326 IAC 2-8-4 (Federally Enforceable State Operating Permit Program) SO_2 emissions from Emission Unit ID B2, Keeler Boiler # 2, and Emission Unit ID B3, Keeler Boiler # 3, each shall be limited to five-tenths (0.5) pounds per million Btu.

D.1.3 Nitrogen Oxides (NO_x) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (Federally Enforceable State Operating Permit Program), NO_x emissions from the combustion of natural gas in Emission Unit ID B2 and/or Emission Unit ID B3 shall not exceed eighteen hundredths (0.18) pounds per million Btu.

This limit is required to limit the potential to emit NO_x to less than 87.6 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.4 Fuel Use Limitation [326 IAC 2-8-4]

The fuel combusted in Emission Unit ID B2, Keeler Boiler #2, and/or in Emission Unit ID B3, Keeler Boiler #3, shall be limited as follows:

a) The combined input of natural gas to Emission Unit ID B2 and Emission Unit ID B3 shall be limited to 972.8 million cubic feet per rolling twelve (12) consecutive month period. This usage limit is equivalent to a potential to emit NO_x of 87.6 tons per year. Or

b) The combined input of distillate fuel oil to Emission Unit ID B2 and Emission Unit ID B3 shall be limited to 2,791,200 gallons per rolling twelve (12) consecutive month period. This usage limit is equivalent to a potential to emit SO_2 of 98.6 tons per year. And,

c) The fuel allotments in subparts a) and b) of this condition shall be adjusted when combusting more than one (1) fuel by the following: Every one (1) million cubic foot reduction in natural gas consumption can be substituted for 6400 gallons of distillate fuel oil consumption provided distillate fuel oil consumption does not exceed 2,791,200 gallons per rolling twelve (12) consecutive month period.

Compliance with fuel usage limiting conditions a) or b) and c) makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID B2 and Emission Unit ID B3.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 12 and 18 months after issuance of this permit, the Permittee shall perform NO_x testing while burning natural gas utilizing Method 7E (40 CFR 60, Appendix A) or other methods as approved by IDEM and ERMD. In addition to these requirements, IDEM and ERMD may require compliance testing when necessary to determine if the Emission Unit(s) is(are) in compliance.

D.1.7 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options:

a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in a) or b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.1.8 Fuel Use Limitation

Compliance with the fuel usage limitation in Condition D.1.4 shall be demonstrated at the end of each month based on the combined total amount and type of fuel combusted in Emission Unit ID B2 and Emission Unit ID B3 per rolling twelve (12) consecutive month period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.9 Visible Emissions Notations

(a) Daily visible emission notations of Emission Unit ID B2 and/or Emission Unit ID B3 stack exhaust, identified as Stack/Vent ID BS2 and BS3, shall be performed during normal

daylight operations when burning distillate oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for each unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications.

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of Stack/Vent ID BS2 and/or Stack/Vent ID BS3 when burning distillate oil.

(c) To document compliance with condition D.1.4, the Permittee shall maintain rolling twelve (12) consecutive monthly records of the type and amount of fuel combusted in the Emission Unit ID B2 and Emission Unit ID B3.

(d) All records shall be maintained in accordance with Section C.18 - General Record Keeping

Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address(es) listed in Section C.19 - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Emission Unit ID PFG 1-7 Seven (7) Piston Grinders	**Facility Description [326 IAC 2-8-4(10)]:** Seven (7) Piston Grinders for piston finishing, serial numbers BT-123315, BT-123314, BT- 123949, BT-123317, BT-123312, BT-139533 and BT-141598, identified as Emission Unit ID PFG 1-7. Steering gear pistons are polished by wet grinding. The interface of the grinding is flooded with machining oils to cool and lubricate the grinding surface. The machining oil is reclaimed and recycled. The seven (7) grinders are exhausted to either one of two (2) Kirk and Blum oil demisters identified as Control Equipment ID CE PFG 1 & 2 and exhausting at Stack/Vent ID PE-JJ9-1 and PE-JJ9-2. Each demister has 60 ft^2 of face area to remove oil mist drops from the air stream. Rated exhaust air flow rate 6000 acfm for each demister. Installation date of 1957. (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the Emission Unit ID PFG 1-7 shall be limited to 0.03 grain per dry standard cubic foot of exhaust. At a maximum air flow rate of 18,000 actual cubic feet per minute, this is equivalent to 4.6 pounds of particulate matter (PM) emissions per hour.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM and/or ERMD, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C.9 - Performance Testing.

SECTION D.3 FACILITY OPERATION CONDITIONS

Emission Unit ID **Mineral Spirits Usage** Mineral Spirits Usage	**Facility Description [326 IAC 2-8-4(10)]:** Cold cleaning dip tanks throughout the source identified as Emission Unit ID Mineral Spirits Usage. Annual consumption of mineral spirits throughout the plant is rated at 49.0 tons of mineral spirits per year. Installation date of 1957. (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-3-5(a)]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.4 FACILITY OPERATION CONDITIONS

Emission Unit ID Plant Wide Miscellaneous Machining Unit ID HG-MACH, PC-MACH, PC-PMACH, PH-GRIND, YA-TAURUS and ZeroUse	**Facility Description [326 IAC 2-8-4(10)]:** Emission Unit ID Plant Wide Miscellaneous Machining in plant wide miscellaneous machining where an aqueous cutting coolant continuously floods the machining interface. Includes plant wide miscellaneous machining in Emission Unit ID's HG-MACH, PC-MACH, PC-PMACH, PH-GRIND, YA-TAURUS and ZeroUse. Installation date of 1957. (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP: Permit Content):

(a) The input of any single hazardous air pollutant (HAP), to Emission Unit ID Plant Wide Miscellaneous Machining shall be limited to less than ten (10.0) tons per rolling twelve (12.0) consecutive month period. Compliance with this usage limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

(b) The input of any combination of hazardous air pollutant (HAPs), to Emission Unit ID Plant Wide Miscellaneous Machining shall be limited to less than twenty five (25.0) tons per rolling twelve (12.0) consecutive month period. Compliance with this usage limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-8-5(a)(1),(4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM and ERMD may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or ERMD, compliance with the HAP limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C.9 - Performance Testing.

D.4.3 Hazardous Air Pollutants (HAPs)

Compliance with Condition D.4.1 shall be demonstrated at the end of each month based on the input of any individual HAP and combined total input of HAPs to Emission Unit ID HG-MACH, PC-MACH, PC-PMACH, PH-GRIND, YA-TAURUS and ZeroUse per rolling twelve (12) consecutive month period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.4 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.4.1.

(1) The amount and HAP content of each cutting coolant used. Records shall include purchase orders, invoices and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total HAPs and individual HAP usage for each month; and

(4) The weight of total HAPs and individual HAP emitted for each compliance period.

(b) All records shall be maintained in accordance with Condition C.18 - General Record Keeping Requirements, of this permit.

D.4.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address(es) listed in Section C.19 - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5 FACILITY OPERATION CONDITIONS

Emission Unit ID SFP1, SFP2 and SFP3 Three (3) Stationary Fire Pumps	**Facility Description [326 IAC 2-8-4(10)]:** Three (3) Stationary Fire Pumps identified as Emission Unit ID SFP1, SFP2 and SFP3. Each stationary fire pump is a reciprocating internal combustion engine fired with diesel fuel. Emission Unit ID SFP1 is rated at 240 horsepower and SFP2 and SFP3 are each rated at 265 horsepower. Installation date of 1957. (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Fuel Use Limitation [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (Federally Enforceable State Operating Permit Program), combined distillate fuel oil consumption in Emission Unit ID SFP1, SFP2 and SFP3 is limited to 7,116.8 gallons per rolling twelve (12) consecutive month period. This usage limit is required to limit NO_x emissions to 2.2 tons per rolling twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Compliance Determination Requirements

D.5.2 Fuel Use Limitation

Compliance with the fuel usage limitation in Condition D.5.1 shall be demonstrated at the end of each month based on the combined total amount of fuel combusted in Emission Unit ID SPF1, SPF2 and SPF3 per rolling twelve (12) consecutive month period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.5.3 Record Keeping Requirements

To document compliance with Condition D.5.1, the Permittee shall maintain a monthly record of combined distillate oil consumption in Emission Unit ID SFP1, SFP2 and SFP3.

D.5.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address(es) listed in Section C.19 - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Visteon Automotive Systems
Source Address: 6900 English Avenue, Indianapolis, Indiana 46219
Mailing Address: 6900 English Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-6964-00021

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Visteon Automotive Systems
Source Address: 6900 English Avenue, Indianapolis, Indiana 46219
Mailing Address: 6900 English Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-6964-00021

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) CThe Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Visteon Automotive Systems
Source Address: 6900 English Avenue, Indianapolis, Indiana 46219
Mailing Address: 6900 English Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-6964-00021

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FESOP Quarterly Report

Source Name: Visteon Automotive Systems
Source Address: 6900 English Avenue, Indianapolis, Indiana 46219
Mailing Address: 6900 English Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-6964-00021
Facility: Keeler Boiler # 2 & Keeler Boiler # 3
Parameter: Natural Gas consumption limit & Distillate Fuel Oil consumption limit
Limit: 972.8 MMCF per rolling twelve (12) consecutive months, or
2791.2 kgal per rolling twelve (12) consecutive month period
6.4 kgal consumption can be substituted for every 1.0 MMCF reduction in natural gas consumption

QUARTER_____ YEAR: _____

Month		Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month 1	gas			
	oil			
Month 2	gas			
	oil			
Month 3	gas			
	oil			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FESOP Quarterly Report

Source Name: Visteon Automotive Systems
Source Address: 6900 English Avenue, Indianapolis, Indiana 46219
Mailing Address: 6900 English Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-6964-00021
Facility: Plant Wide Miscellaneous Machining
Parameter: Individual and Combined HAPs limit
Limit(s): less than 10.0 tons individual HAP per rolling twelve (12) consecutive months
less than 25.0 tons combined HAPs per rolling twelve (12) consecutive months

QUARTER_____ YEAR: _____

Month		Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month	HAP			
	HAP			
	HAPs			
Month	HAP			
	HAP			
	HAPs			
Month	HAP			
	HAP			
	HAPs			

9No deviation occurred in this quarter.

9Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FESOP Quarterly Report

Source Name: Visteon Automotive Systems
Source Address: 6900 English Avenue, Indianapolis, Indiana 46219
Mailing Address: 6900 English Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-6964-00021
Facility: Stationary Fire Pumps SFP1, SFP2 and SFP3
Parameter: Distillate Fuel Oil consumption limit
Limit: 7,116.8 gallons per rolling twelve (12) consecutive months

QUARTER_____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Visteon Automotive Systems
Source Address: 6900 English Avenue, Indianapolis, Indiana 46219
Mailing Address: 6900 English Avenue, Indianapolis, Indiana 46219
FESOP No.: F097-6964-00021

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management
and
Indianapolis Environmental Resources Management Division

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	**Visteon Automotive Systems**
Source Location:	**6900 English Avenue, Indianapolis, Indiana 46219**
County:	**Marion**
SIC Code:	**3714**
Operation Permit No.:	**F097-6964-00021**
Permit Reviewer:	**M. Caraher**

The Office of Air Management (OAM) and the City of Indianapolis, Environmental Resources Management Division (ERMD) have reviewed a FESOP application from Visteon Automotive Systems relating to the operation of a motor vehicle parts and accessories manufacturing operation under a Standard Industrial Classification (SIC) Code number of 3714 - Steering mechanisms, motor vehicle.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) Keeler boiler serial number 13160-1 identified as Emission Unit ID B2 with a maximum rated heat input capacity of 146.0 million Btu per hour firing natural gas or # 2 fuel oil. Emission Unit ID B2 exhausts at Stack/Vent ID BS2. Installation date of 1957.

(b) One (1) Keeler boiler serial number 13160-2 identified as Emission Unit ID B3 with a maximum rated heat input capacity of 146.0 million Btu per hour firing natural gas or # 2 fuel oil. Emission Unit ID B3 exhausts at Stack/Vent ID BS3. Installation date of 1957.

(c) Seven (7) Piston Grinders for piston finishing, serial numbers BT-123315, BT-123314, BT-123949, BT-123317, BT-123312, BT-139533 and BT-141598, identified as Emission Unit ID PFG 1-7. Steering gear pistons are polished by wet grinding. The interface of the grinding is flooded with machining oils to cool and lubricate the grinding surface. The machining oil is reclaimed and recycled. The seven (7) grinders are exhausted to either one of two (2) Kirk and Blum oil demisters identified as Control Equipment ID CE PFG 1 & 2 and exhausting at Stack/Vent ID PE-JJ9-1 and PE-JJ9-2. Each demister has 60 ft^2 of face area to remove oil mist drops from the air stream. Rated exhaust air flow rate 6000 acfm for each demister. Installation date of 1957.

(d) Cold cleaning dip tanks throughout the source identified as Emission Unit ID Mineral Spirits Usage. Annual consumption of mineral spirits throughout the plant is rated at 49.0 tons of mineral spirits per year. Installation date of 1957.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(a) Plant wide miscellaneous machining where an aqueous cutting coolant continuously floods

the machining interface. Includes plant wide miscellaneous machining in Emission Unit ID's HG-MACH, PC-MACH, PC-PMACH, PH-GRIND, YA-TAURUS and ZeroUse. Installation date of 1957.

Historical potential to emit VOC has been estimated to be at registration level while potential to emit diethanolamine (a HAP) is in excess of ten (10) tons per year (see TSD Appendix A pages 1 and 6 of 12).

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

1) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
2) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
3) The following VOC and HAP storage containers:
   A) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
4) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
6) Cleaners and solvents characterized as follows:
   A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
   B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);

   the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
7) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
8) Closed loop heating and cooling systems.
9) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
10) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
11) Noncontact cooling tower systems with either of the following:
   A) Forced and induced draft cooling tower system not regulated under a NESHAP.
12) Quenching operations used with heat treating processes.
13) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
14) Heat exchanger cleaning and repair.
15) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
16) Paved and unpaved roads and parking lots with public access.
17) Asbestos abatement projects regulated by 326 IAC 14-10.
18) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
19) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
20) Stationary fire pumps. Three (3) Stationary Fire Pumps identified as Emission Unit ID SFP1, SFP2 and SFP3. Each stationary fire pump is a reciprocating internal combustion engine fired with diesel fuel. Emission Unit ID SFP1 is rated at 240 horsepower and SFP2 and SFP3 are each rated at 265 horsepower. Installation date of 1957.

21) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
22) A laboratory as defined in 326 IAC 2-7-1(20)(C).
23) Natural gas fired combustion sources identified as heat treating units with maximum heat input capacity of any individual heat treating unit equal to or less than ten (10) million Btu per hour. Combined plant wide heat treating units capacity is 16.7 million Btu per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Certificate of Operation (C.O.) # 0021 issued on October 13, 1992 for the following facilities/units;

(1) C.O. # 0021-01 for one (1) Keeler spreader stoker boiler at 73 million Btu per hour maximum rated heat input firing coal and at 15 million Btu per hour maximum rated heat input firing waste oil.

(2) C.O. # 0021-02 for one (1) Keeler boiler rated at 146 million Btu per hour and firing coal and # 2 fuel oil.

(3) C.O. # 0021-03 for one (1) Keeler boiler rated at 146 million Btu per hour and firing coal and # 2 fuel oil.

(4) C.O. # 0021-04 for eleven (11) Green Worm Grinding machines exhausting to one (1) electrostatic precipitator.

(5) C.O. # 0021-05 for seven (7) Piston Finish Grinders exhausting to two (2) oil demisters.

(6) C.O. # 0021-06 for Mineral Spirits Usage in dip tanks.

(b) Exemption Letter of June 27, 1994 for the conversion of Emission Unit ID B2 and B3 from coal firing/# 2 fuel oil firing to natural gas/# 2 fuel oil firing.

(c) On March 31, 1998, a request for a Name Change was received by ERMD to change the source name from Ford Motor Company to Visteon Automotive Systems.

(d) On July 16, 1999, a request was made by Visteon Automotive Systems to delete all reference to Boiler # 1 (current C.O. # 0021-01) in the proposed FESOP as Boiler # 1 has been decommissioned with IDEM, OAM and ERMD duly notified July 20, 1999.

All conditions from previous approvals were incorporated into this FESOP except the following:

(a) Certificate of Operation C.O. # 0021-01 through C.O. # 0021-03, issued on October 13, 1992 Condition # 3 stated:
"The coal fired boilers shall be operated such that particulate emissions do not exceed 110.2 tons per year per Regulation II-1 Appendix A. This corresponds to burning 34, 890 tons of coal per year assuming operation at capacity and a coal heat content of 11,700 Btu/lb."

Reason not incorporated:
Coal firing is no longer performed at this source and Boiler # 1 (current C.O. # 0021-01) has been decommissioned. Therefore, the coal throughput limit of 34,890 tons of coal firing per year is not incorporated into this FESOP.

(b) Certificate of Operation C.O. # 0021-01 through C.O. # 0021-03, issued on October 13, 1992 Condition # 10 stated:
" The Permittee shall operate an opacity monitor for each coal fired boiler, pursuant to 326 IAC 3-1. The opacity monitors shall meet minimum performance and operating specifications listed in 326 IAC 3-1.1-2."

Reason not incorporated:
The previous rule cite 326 IAC 3-1 (Monitoring Requirements) has been repealed and codified in a new state rule 326 IAC 3-5 (Continuous Monitoring of Emissions). In addition, the source received an Exemption Letter of June 27, 1994 for the conversion of Emission Unit ID B2 and B3 from coal firing and # 2 fuel oil firing to natural gas and # 2 fuel oil firing. Also, Visteon Automotive Systems petitioned July 20, 1999 that all reference to coal firing in Emission Unit ID B1 (Boiler # 1) be deleted from the initial FESOP application. All reference to coal firing has been deleted from the proposed FESOP.

Pursuant to 326 IAC 3-5-1(c)(2)(A) (Continuous Monitoring of Emissions), this source is no longer required to perform continuous opacity monitoring because oil or a mix of oil and gas are the only fuels combusted and the facility is able to comply with 326 IAC 5-1 (Opacity Regulations) and 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) without using particulate matter collection equipment.

(c) Certificate of Operation C.O. # 0021-04 (Eleven green worm grinding machines equipped with one United Air Specialists "Smog Hog" electrostatic precipitator), issued on October 13, 1992 Condition # 3 stated:
"Allowable emissions from the grinding machines (Certificate Number 0021-04) are based on Regulation II-2. Long term emissions are based on 8760 hours of operation per year."

Reason not incorporated:
The source has stated in the application review process that these units have been replaced by dry machining units with no internal or external exhaust and with negligible emissions that do not qualify as either a significant or an insignificant activity. The source has not made an application for these units and requests deletion of any mention as a significant or insignificant emission unit(s). Therefore, there is no applicable PM emission limit for the dry machining unit replacements.

(d) Certificate of Operation C.O. # 0021-06 (Mineral Spirits Usage), issued on October 13, 1992 Condition # 3 stated:
"Allowable VOC emissions from mineral spirits usage are based on a maximum anticipated annual solvent usage of 13,200 gallons."
In addition, mineral spirits usage was limited to 49.0 tons per year.

Reason not incorporated:
The source has stated in the application review process that they are not a major source for VOC. Potential to emit VOC, for this determination and review, does not appear to exceed 100 tons per year (see TSD Appendix A page 1 of 12). In addition, individual cold cleaning dip tanks throughout the source are regulated by 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) but long term VOC emission limits are not specified in 326 IAC 8-3-5 or 326 IAC 8 (Volatile Organic Compound Rules) in general. Because this source is not major for VOC and there are no New Source Review or 326 IAC 8 long term emission limitations applicable to mineral spirits usage at this source, no long term VOC emission limit from Emission Unit ID Mineral Spirits is incorporated in to the proposed FESOP.

Enforcement Issue

(a) IDEM and ERMD are aware that equipment has been constructed and/or operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled **Unpermitted Emission Units and Pollution Control Equipment.**

(b) IDEM and ERMD are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Title V application was received on October 18, 1996.

On March 31, 1998, a request for a Name Change was received by ERMD to change the source name from Ford Motor Company to Visteon Automotive Systems.

On June 19, 1998, a request and application was received by IDEM, OAM and ERMD to change the processing of the application for this source as a Title V source to a FESOP source.

Due to the decommissioning of Boiler # 1, a request was made by Visteon Automotive Systems on July 16, 1999, to delete reference to Boiler # 1 (current C.O. # 0021-01) in the proposed FESOP.

An administratively complete FESOP application for the purposes of this review was received on October 18, 1996. Additional information in response to a Request For Additional Information was received on May 24, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (TSD Appendix A, pages 1 through 12).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	48.9
PM-10	48.9
SO_2	645.5
VOC	85.4
CO	114.0
NO_x	367.7

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Hexane	2.5
Diethylanolamine	12.0
Diethylene Glycols	5.7
Hydrogen Chloride	0.6

Methylene Bisphenol Isocyanate	1.2
Toluene	0.3
TOTAL	***22.6***

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO_2, NO_x and CO are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

and

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

and

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM actual emission data. Combined HAP actual emissions are from the June 19, 1998 application and request to convert the Title V application to a FESOP.

Pollutant	Actual Emissions (tons/year)
PM	54.3
PM-10	14.2
SO_2	22.9
VOC	94.3
CO	11.8
NO_x	91.9
HAP (combined)	7.3

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Emission Unit ID B2 Keeler boiler	4.6	4.6	98.6	2.7	40.9	87.6	0.0
Emission Unit ID B3 Keeler boiler							
Emission Unit ID PFG 1-7 Piston Finish Grinders 1-7	18.0	18.0	0.0	13.1	0.0	0.0	0.0

Emission Unit ID Mineral Spirits Usage	0.0	0.0	0.0	49.0	0.0	0.0	0.0
Emission Unit ID's HG-MACH, PC-MACH, PC-PMACH, PH-GRIND, YA-TAURUS & ZeroUse Plant Wide Miscellaneous Machining	0.0	0.0	0.0	15.7	0.0	0.0	9.0/24.0
Insignificant Activities Emission Unit ID SFP1, SFP2 & SFP3 Stationary Fire Pump 1, 2 & 3	0.2	0.2	0.1	0.2	0.5	2.2	0.0
Insignificant Activities	0.6	0.6	0.0	0.4	6.1	7.3	0.1
Total Emissions	23.4	23.4	98.7	81.1	47.5	97.1	9.0/24.0

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The conversion from coal firing to natural gas firing in 1994 for Emission Unit ID B2 and B3, two (2) Keeler boilers, was not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b), Subpart Db, because the unit(s) was constructed in 1957 and the conversion to natural gas firing was not determined to be a modification because there was no hourly or annual increase in the potential, allowable or actual emission rate of any regulated pollutant.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on August 4, 1993. An update to the ERP was received on June 29, 1999. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit

more than ten (10) tons per year in Marion County of NO_x and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 2-7 (Part 70 Permit Program)

This source has the potential to emit SO_2, NO_x, CO and diethylanolamine (a HAP) in excess of the major source threshold(s) and is therefore required to obtain a permit under 326 IAC 2-7 (Part 70 Permit Program).

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

This source, otherwise required to obtain a Part 70 Permit under 326 IAC 2-7 (Part 70 Permit Program) is electing to obtain a FESOP under 326 IAC 2-8 (Federally Enforceable State Operating Permit Program). The source reports actual emissions of less than any major source threshold and is therefore eligible to obtain a FESOP if it so wishes.

326 IAC 5-1 (Opacity Regulations)

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

Emission Unit ID B2 & B3 - Keeler boilers 2, & 3

326 IAC 1-7 (Stack Height Provisions)

Pursuant to 326 IAC 1-7 (Stack Height Provisions), all sources having exhaust gas stacks through which a potential of twenty five (25) tons per year or more of PM and/or SO_2 (see TSD Appendix A calculation spreadsheets) are emitted may request an increase in stack height up to GEP stack height. Because these stacks were constructed prior to December 31, 1970, 326 IAC 1-7-5 exempts the source from an ambient air quality modeling demonstration.

326 IAC 2 (Permit Review Rules)

This source and these emission units have been in operation since 1957. Emission Unit ID B2 and B3 each have historically had allowable PM, SO_2 and NO_x emissions exceeding minimum permitting thresholds as stated in 326 IAC 2 (Permit Review Rules). Pursuant to 326 IAC 2 (Permit Review Rules), these emission units have been operating under Certificate of Operation # 0021-02 and 0021-03 and now elects to obtain a permit under 326 IAC 2-8 (Federally Enforceable State Operating Permit Program).

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

Pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit Program), SO_2 and NO_x potential to emit is limited to less than the major source threshold. Limiting SO_2 and NO_x thereby limits CO to less than the major source threshold. The permittee requires, at a minimum, an annual steam production limit of no less than 400,000 tons of steam production per year. Burning the required amount of natural gas to annually produce 400,000 tons of steam per year at the AP-42 emission factor of 280 pounds of NO_x/MMCF, yields NO_x emissions in excess of 100 tons per year. A short term NO_x emission limitation, lower than the AP-42 emission factor and established pursuant to 326 IAC 2-8, is required to limit NO_x potential to emit to less than the major source threshold (see

TSD Appendix A page 10 of 12). The source performed an IDEM/ERMD witnessed stack test for NO_x in February 1995 and found emissions of 0.15 pounds per million Btu (150 pounds per million cubic feet). Therefore, a short term limit is established to limit emissions to less than a major source. When burning natural gas, NO_x potential to emit is limited by limiting NO_x emissions to 0.18 pounds per million Btu and 972.8 million cubic feet of natural gas consumption per rolling twelve (12) consecutive month period.

By limiting fuel oil consumption to 2791.2 kgals per rolling twelve consecutive month period, SO_2 emissions are limited to less than the major source threshold thereby also limiting NO_x emissions while burning fuel oil to less than the major source threshold (see TSD Appendix A page 12 of 12). These fuels cannot be combusted simultaneously in an emission unit. However, a multiple fuel use limit is established pursuant to 326 IAC 2-8 in order to limit potential to emit NO_x and SO_2 to less than the major source threshold. For every 1 million cubic foot reduction in natural gas consumption per rolling twelve (12) consecutive month period, 6.4 kgal of fuel oil consumption may be substituted in order to limit FESOP potential to emit to less than the major source threshold (see TSD Appendix A page 12 of 12).

326 IAC 3-5 (Monitoring Requirements: Continuous Monitoring of Emissions)

Pursuant to 326 IAC 3-5-1(c)(2)(A) (Continuous Monitoring of Emissions), this source is no longer required to perform continuous opacity monitoring because oil or a mix of oil and gas are the only fuels combusted and the facility is able to comply with 326 IAC 5-1 (Opacity Regulations) and 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) without using particulate matter collection equipment.

326 IAC 3-7 (Monitoring Requirements: Fuel Sampling and Analysis Procedures)

Pursuant to 326 IAC 3-7-4 (Fuel Oil Sampling; Analysis Methods), the source shall sample and analyze the sulfur content and heat content of fuel oil utilizing the applicable specified ASTM procedures as stated in 326 IAC 3-7-4. The source may rely on equivalent sampling and analysis procedures performed by the vendor prior to delivery of the fuel oil. Pursuant to 326 IAC 3-7-5 (Record Keeping Requirements), the permittee shall maintain records sufficient to verify compliance with the procedures specified in 326 IAC 3-7-4 for a period of five (5) years and shall be made available upon request by ERMD and/or IDEM,OAM.

326 IAC 6-1-12 (Particulate Rules: Marion County)

326 IAC 6-1-12 (Particulate Rules: Marion County), Emission Unit ID B1, B2 and B3 shall comply with the following PM emission limits:

Emission Unit	pounds per million Btu	tons per year
~~Boiler # 1 (Emission Unit ID B1)~~	~~0.27~~	~~16.5~~
Boiler # 2 (Emission Unit ID B2)	0.27	55.1
Boiler # 3 (Emission Unit ID B3)	0.27	38.6

As of 1994, boiler # 2 and # 3 have been converted from firing coal and # 2 fuel oil to firing natural gas and # 2 fuel oil. See TSD Appendix A pages 2, 3 and 4 of 12 for a calculated demonstration of compliance with PM emission limits. Boiler # 1 has been decommissioned and the application request for this unit has been withdrawn. The last PM stack test of any boiler unit was on boiler # 1 and was performed on March 30, 1983 while firing coal and the PM emission rate was determined to be 0.255 pounds per million Btu.

In addition, the source is not major for PM10 and, as a result, no PM10 emission limitations are established pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit Program).

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

Allowable SO_2 emissions, limited pursuant to 326 IAC 7-4-2 (Sulfur Dioxide Rules: Marion County Sulfur Dioxide Emission Limitations), do not limit SO_2 emissions to less than the major source

threshold. Therefore, pursuant to 326 IAC 2-8-4 (FESOP; Permit Content), SO_2 emissions are limited to 0.5 pounds per million Btu which is equivalent to the short term emission limit found in 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations) applicable to sources combusting distillate oil. The maximum fuel sulfur content of fuel oil consumed must not exceed 0.45% sulfur by weight (157(S) pounds SO_2/kgal x kgal/140 MMBtu = 0.5 pounds SO_2/MMBtu; (S) = 0.45%S).

326 IAC 7-2 (Sulfur Dioxide Emission Limitations: Reporting Requirements; Methods to Determine Compliance)

Pursuant to 326 IAC 7-2 (Sulfur Dioxide Emission Limitations: Reporting Requirements; Methods to Determine Compliance), the permittee shall submit reports of calendar month average sulfur content, heat content, fuel consumption and sulfur dioxide emission rate in pounds per million Btu upon request. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 (Fuel Oil Sampling; Analysis Methods). Compliance or noncompliance shall be determined using a calendar month average sulfur dioxide emission rate in pounds per million Btu.

326 IAC 7-4-2 (Sulfur Dioxide Rules: Marion County Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-4-2 (Sulfur Dioxide Rules: Marion County Sulfur Dioxide Emission Limitations), Emission Unit ID B1, B2 and B3 shall comply with the following SO_2 emission limits:

Emission Unit	pounds per million Btu	pounds per hour
~~Boiler # 1 (Emission Unit ID B1)~~	~~2.43~~	~~177.38~~
Boiler # 2 (Emission Unit ID B2)	2.43	354.77
Boiler # 3 (Emission Unit ID B3)	2.43	354.77

As of 1994, boiler # 2 and # 3 have been converted from firing coal and # 2 fuel oil to firing natural gas and # 2 fuel oil. See TSD Appendix A pages 2, 3 and 4 of 12 for a calculated demonstration of compliance with SO_2 emission limits. Boiler # 1 has been decommissioned and the application request for this unit has been withdrawn. Utilizing AP-42 emission factors and a sulfur content of 0.38 % sulfur by weight, Emission Unit ID B2 and B3, each boiler appears to be in compliance with the SO_2 emission limitations (see TSD Appendix A page 3 of 12).

In addition, the allowable SO_2 limitations of 326 IAC 7-4-2 (Sulfur Dioxide Rules: Marion County Sulfur Dioxide Emission Limitations) do not limit the source potential to emit SO_2 to less than the major source threshold. Therefore, SO_2 emissions are limited pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations) and 326 IAC 2-8 (Federally Enforceable State Operating Permit Program) (see above section 326 IAC 2-8 (Federally Enforceable State Operating Permit) and 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)).

Emission Unit ID PFG 1-7 - Piston Finishing Grinders

326 IAC 2 (Permit Review Rules)

This source and this emission unit has been in operation since 1957. Emission Unit ID PFG 1-7 has historically had allowable PM emissions exceeding the minimum permitting thresholds as stated in 326 IAC 2 (Permit Review Rules). Pursuant to 326 IAC 2 (Permit Review Rules), this emission unit has been operating under Certificate of Operation # 0021-05 and now elects to obtain a permit and limit PM emissions under 326 IAC 2-8 (Federally Enforceable State Operating Permit Program).

326 IAC 6-1-2 (Nonattainment Area Limitations: Particulate Emission Limitations)

Pursuant to 326 IAC 2 (Permit Review Rules), 326 IAC 2-8 (Federally Enforceable State Operating Permit Program), 326 IAC 6-1-12 (Nonattainment Area Particulate Limitations) and previous Certificate of Operation # 0021-05, PM emissions are limited to 0.03 gr/dscf.

Emission Unit ID Mineral Spirits Usage - Mineral Spirits Usage

326 IAC 2 (Permit Review Rules)

This source and this emission unit has been in operation since 1957. Emission Unit ID Mineral Spirits Usage has historically had allowable VOC emissions exceeding the minimum permitting thresholds as stated in 326 IAC 2 (Permit Review Rules). Pursuant to 326 IAC 2 (Permit Review Rules), this emission unit has been operating under Certificate of Operation # 0021-06 and now elects to obtain a permit under 326 IAC 2-8 (Federally Enforceable State Operating Permit Program).

326 IAC 8-3-1(b) (Organic Solvent Degreasing Operations: Applicability)

Pursuant to 326 IAC 8-3-1(b) (Organic Solvent Degreasing Operations: Applicability), 326 IAC 8-3-5 (Volatile Organic Compound Rules: Cold Cleaner Degreaser Operation and Control) is applicable to organic solvent degreasing operations located in Marion County and existing as of July 1, 1990. Visteon has existing cold cleaning operations located in Marion County and existing as of July 1, 1990.

326 IAC 8-3-5 (Volatile Organic Compound Rules: Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Emission Unit ID Plant Wide Miscellaneous Machining - HG-MACH, PC-MACH, PC-PMACH, PH-GRIND, YA-TAURUS and ZeroUse

326 IAC 2 (Permit Review Rules)

This source and these emission units have been in operation since 1957. Emission Unit ID Plant Wide Miscellaneous Machining has historically had combined VOC emissions exceeding minimum permitting thresholds as stated in 326 IAC 2 (Permit Review Rules). However, no one single machining emission unit exceeds minimum permitting thresholds. The combination of similar units is done for the purposes of this review and determination because the combination of these units yields single HAP emissions, diethanolamine, in excess of ten (10) tons per year. As a result, these machining operations become a significant emission unit. These emission units have not been included in past Certificates of Operation issued to this source. The source elects to combine these units and obtain a FESOP in order to limit potential to emit a single HAP, diethanolamine, to less than the major source threshold. In addition, the source is not major for VOC and, as a result, there is no VOC limited potential to emit pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit Program).

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

Pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit Program), diethanolamine (a HAP) emissions are limited to less than ten (10.0) tons per rolling twelve (12) consecutive month period. This is equivalent to gallons of diethanolamine per rolling twelve (12) consecutive month period.

However, during review of this draft FESOP, the source requested the flexibility to change machining coolants which may have differing levels of HAP content in their formulation. As a result, individual and combined HAPs are limited by 326 IAC 2-8-4 to:

(a) The input of any single hazardous air pollutant (HAP), to Emission Unit ID Plant Wide Miscellaneous Machining shall be limited to less than ten (10.0) tons per rolling twelve (12.0) consecutive month period. Compliance with this usage limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

(b) The input of any combination of hazardous air pollutant (HAPs), to Emission Unit ID Plant Wide Miscellaneous Machining shall be limited to less than twenty five (25.0) tons per rolling twelve (12.0) consecutive month period. Compliance with this usage limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Insignificant Activities - Emission Unit ID SFP1, SFP2 & SFP3 - Stationary Fire Pumps 1, 2 & 3

326 IAC 2 (Permit Review Rules)

This source and these emission unit have been in operation since 1957. Emission Unit ID SFP1, SFP2 and SFP3 has historically had allowable NO_x emissions exceeding the minimum registration thresholds as stated in 326 IAC 2 (Permit Review Rules). These emission units have not been included in past Certificates of Operation issued to this source. However, pursuant to 326 IAC 2-7-1(21) (Part 70 Permit Program: Definitions) and Form GSD 10a from the FESOP application, these emission units are deemed an Insignificant Activity. The source must limit source wide NO_x

emissions under 326 IAC 2-8 (Federally Enforceable State Operating Permit Program).

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

Pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit Program), NO_x emissions are limited by limiting combined annual diesel fuel consumption to 7116.8 gallons per rolling twelve (12) consecutive month period. This is equivalent to 2.2 tons of NO_x emissions per rolling twelve (12) consecutive month period. This is also equivalent to each stationary fire pump operating at capacity for 500 annual operating hours.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. Emission Unit ID B2, Keeler Boiler # 2, and Emission Unit ID B3, Keeler Boiler have applicable compliance monitoring conditions as specified below:

Visible Emissions Notations

(a) Daily visible emission notations of Emission Unit ID B2 and/or Emission Unit ID B3 stack exhaust, identified as Stack/Vent ID BS2 and BS3, shall be performed during normal daylight operations when burning distillate oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for each unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary to verify that Emission Unit ID B2 and B3 must operate properly to ensure compliance with 326 IAC 6-1-12 (Particulate Rules: Marion County) and 326 IAC 5 (Opacity Regulations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations (TSD Appendix A pages 1 through 12).

Conclusion

The operation of this motor vehicle parts and accessories manufacturing operation under a Standard Industrial Classification (SIC) Code number of 3714 - Steering mechanisms, motor vehicle shall be subject to the conditions of the attached proposed **FESOP No.: F097-6964-00021**.

APPENDIX A

Appendix A: Significant & Insignificant Emission Unit Summary

Emission Unit ID PTE Summary prior to FESOP limits

Company Name: Visteon Automotive Systems
Address City IN Zip: 6900 English Avenue, Indianapolis, IN 46219
CP:
Plt ID: F097-6964-00021
Reviewer: M. Caraher
Date: 07/21/99

Old C.O. #	Emission Unit ID	Stack/Vent ID	Controlled ? CE ID	Install Date	Equipment & Capacity & fuel(s)	PTE in tons/yr PM	PM10	SO2	VOC	NOx	CO	Highest HAP	Combined HAPs
0021-01	***B1***	***BS1***	***NA***	***1957***	***Keeler Boiler 73 MMBtu/hr waste oil (@ 15 MMBtu/hr max)***		***application***	***withdrawn***	***07/20/99***				
0021-02	B2	BS2	NA	1957	Keeler Boiler 146 MMBtu/hr natural gas / #2 fuel oil	15.1	15.1	322.7	3.5 natural gas	179.1 natural gas	53.7 natural gas	1.2 Hexane	1.2
0021-03	B3	BS3	NA	1957	Keeler Boiler 146 MMBtu/hr natural gas / #2 fuel oil	15.1	15.1	322.7	3.5 natural gas	179.1 natural gas	53.7 natural gas	1.2 Hexane	1.2
0021-04	***GWG***	***PE-FF8-1***	***Yes / ESP CE GWG***	***1957***	***11 Green Worm Grinders NA NA***	***replaced***	***by dry***	***machining***	***with no***	***internal or***	***external***	***exhaust***	
0021-05	PFG 1-7	PE-JJ9-1 & PE-JJ9-2	Yes / 2 oil demisters CE PFG 1 & 2	1957	7 Piston Grinders NA NA	18.0	18.0		13.1				
0021-06	Mineral Spirits Usage	NA	NA	1957	Dip Tanks	0.0	0.0	0.0	49.0	0.0	0.0	0.0	0.0
Insignificant Activity	Heat Treating	misc.	NA	1957	Heat Treating Total = 16.7 MMBtu/hr natural gas	0.6	0.6	0.0	0.4	7.3	6.1	0.1 Hexane	0.1
Insignificant Activity	plantwide misc machining	misc	NA	1957	plantwide machining operations				15.7			12.0 Dethylanolamine	20.1
At Registration Level	Stationary Fire Pumps SFP1, 2 & 3	misc.	NA	1957	Emergency Fire Pumps Total = 1.3 MMBtu/hr diesel fuel @ 500 hours / yr	0.2	0.2	0.1	0.2	2.2	0.5	0.0	0.0
NA	***Powder Coating***	***NA***	***NA***		***Surface Coating utilizing Powder application equipment***	***no***	***internal***	***or***	***external***	***exhaust***			
					SUM	**48.9**	**48.9**	**645.5**	**85.4**	**367.7**	**114.0**	**12.0**	**22.6**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
>100 MM BTU/HR
Boilers

Emission Unit ID's
B2 - Boiler # 2
B3 - Boiler # 3

each @ 146.0 MMBtu/hr

Company Name: **Visteon Automotive Systems**
Address City IN Zip CP: **6900 English Avenue, Indianapolis, IN 46219**
Plt ID: **F097-6964-00021**
Reviewer: **M. Caraher**
Date: **07/17/99**

Heat Input Capacity MMBtu/hr:	Potential Throughput MMCF/yr:
146	1279

		Pollutant					
		PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF		7.6	7.6	0.6	280.0	5.5	84.0
Potential Emissions in pounds/hr		1.1	1.1	0.1	40.9	0.8	12.3
Potential Emission in tons/yr		4.9	4.9	0.4	179.1	3.5	53.7
	tons sum of 2 units	9.7	9.7	0.8	358.1	7.0	107.4

Methodology
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: Uncontrolled = 280 (pre NSPS) or 190 (post NSPS), Manufacturer estimate = 100, Low NOx Burner = 140, Flue gas recirculation = 100
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3 (Supplement E 9/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

		HAPs - Organics				
		Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF		0.0021	0.0012	0.075	1.8	0.0034
Potential Emission in tons/yr		0.0	0.0	0.0	1.2	0.0
	tons sum of 2 units	0.0	0.0	0.1	2.3	0.0

		HAPs - Metals				
		Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMCF		0.0005	0.0011	0.0014	0.00038	0.0021
Potential Emission in tons/yr		0.0	0.0	0.0	0.0	0.0
	tons sum of 2 units	0.0	0.0	0.0	0.0	0.0

Methodology is the same as above

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4. (Supplement E 9/98)

PM & SO2 Compliance Demonstration:

	PM (326 IAC 6-1-12) limit(s)		SO2 (326 IAC 7-4-2) limit(s)	
	#/MMBtu	tons/yr	#/MMBtu	#/hr
Boiler # 2	0.27	55.1	2.43	354.77
Boiler # 3	0.27	38.6	2.43	354.77

PM: emfac of 7.6 # / MMCF = 7.6 # / MMCF x MMCF / 10^6 ft^3 x ft^3 / 1000 Btu x 10^6 Btu / MMBtu = 0.0076 # / MMBtu
emfac is lower than allowable limit

7.6 # / MMCF x MMCF / 1000 MMBtu x 146 MMBtu / hr x 8760 / 2000 = 4.9 tons PM / yr
lower than allowable ton per year limit

SO2: emfac of 0.6 # / MMCF = 0.6 # / MMCF x MMCF / 1000 MMBtu = 0.0006 # SO2 / MMBtu
emfac is lower than allowable limit

0.6 # / MMCF x MMCF / 1000 MMBtu x 146 MMBtu / hr = 0.088 pounds per hour
lower than allowable pound per hour limit

Appendix A: Emissions Calculations
Industrial Boiler
 # 1 & # 2 Fuel oil

Emission Unit ID's
B2 - Boiler # 2
B3 - Boiler # 3

each @ 146.0 MMBtu/hr

Company Name: **Visteon Automotive Systems**
Address City IN Zip: **6900 English Avenue, Indianapolis, IN 46219**
CP:
Plt ID: **F097-6964-00021**
Reviewer: **M. Caraher**
Date: **04/20/99**

Heat Input Capacity MMBtu/hr:	Potential Throughput kgals/yr	S = Weight % S
146	9135	0.45

		Pollutant					
		PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal		3.3	3.3	70.7 *(157S)*	24.0	0.2	5.0
Potential Emissions in pounds/hr		3.4	3.4	73.7	25.0	0.2	5.2
Potential Emission in tons/yr		15.1	15.1	322.7	109.6	0.9	22.8
	tons sum of 2 units	30.1	30.1	645.4	219.3	1.8	45.7

Methodology

1 gallon of No. 2 Fuel oil has a heating value of 140,000 Btu
Potential Throughput (kgal/yr) = Heat Input Capacity (MMBtu/hr) x 8760 hrs/yr x 1 kgal/1000 gal x 1 gal/0.140 MMbtu

Emission factors are from AP-42 Section 1.3 (Supplement E 9/98)
PM emissions are condensable and filterable PM
Emissions (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2000 lb/ton

Industrial Boilers
#1 and #2 Fuel Oil
HAPs Emissions

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0

HAPs - Metals (continued)

	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	0.0	0.0	0.0	0.0

Methodology

No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton
Emission factors are from AP-42 Section 1.3 (Supplement E 9/98)

PM Compliance Determination:

	PM (326 IAC 6-1-12) limit(s)		SO2 (326 IAC 7-4-2) limit(s)	
	#/MMBtu	tons/yr	#/MMBtu	#/hr
Boiler # 2	0.27	55.1	2.43	354.77
Boiler # 3	0.27	38.6	2.43	354.77

PM: emfac of 3.3 # / kgal = 3.3 # / kgal x gal / 140000 Btu x 10^6 Btu / MMBtu = 0.02 # / MMBtu
emfac is lower than allowable limit

3.3 # / kgal x gal / 140000 Btu x 10^6 Btu / MMBtu x 146 MMBtu / hr x 8760 / 2000 = 15.1 tons PM per year
lower than allowable ton per year limit

SO2: emfac of 157(S) # / kgal = 157(0.45) # / kgal x gal / 140000 Btu x kgal/1000 gal x 10^6 Btu / MMBtu = 0.50# / MMBtu
emfac at % sulfur is far lower than allowable limit

157(0.45) # / kgal x kgal/1000 gal x gal/0.14 MMBtu x 146 MMBtu/hr = 73.7 # SO2 / hr
lower than allowable pound per hour limit

max fuel sulfur content required to meet 0.5 # SO2/MMBtu (326 IAC 7-1.1-2):
157(S) # SO2/kgal x kgal/140 MMBtu = 0.5 # SO2/MMBtu
(S) = 0.45% sulfur by weight

Appendix A: Emissions Calculations
Industrial Boiler
Coal fired Spreader Stoker

Emission Unit ID
B1 - Boiler # 1
Application withdrawn 07/20/99

Company Name: **Visteon Automotive Systems**
Address City IN Zip: **6900 English Avenue, Indianapolis, IN 46219**
CP:
Plt ID: **F097-6964-00021**
Reviewer: **M. Caraher**
Date: **07/21/99**

Heat Input Capacity MMBtu/hr:	Potential Throughput tons/yr	S = Weight % S	Btu/lb coal
0	0	1.57	12415

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/ton	66.0	13.2	59.7 *(38S)*	11.0	0.1	5.0
Potential Emissions in pounds/hr	0.0	0.0	0.0	0.0	0.0	0.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0	0.0

Methodology

1 pound of coal is 12415 Btu
Potential Throughput (tons/yr) = Heat Input Capacity (MMBtu/hr) x 8760 hrs/yr x 1 lb coal/12415 Btu x 1 ton coal/2000 ob coal

Emission factors are from AP-42 Tables 1.1-3, 1.1-4 and 1.1-19 (Supplement E 9/98)
Emissions (tons/yr) = Throughput (tons/yr) x Emission Factor (lb/ton) / 2000 lb/ton
fuel sulfur content from 1/97 quarterly SO2 report

Industrial Boilers
Coal firing
HAPs Emissions

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead	Mercury	Manganese	Nickel	Selenium	Formaldehyde
Emission Factor in lb/10^12 Btu	542	ND	43	1570	507	ND	ND	ND	ND	221
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

HAPs - (continued)

	HCL	HF
Emission Factor in lb/ton	1.2	0.15
Potential Emission in tons/yr	0.0	0.0

Methodology

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton
Emission factors are from AP-42 Tables 1.1-15 and 1.1-17 (Supplement E 9/98)

PM & SO2 Compliance Determination:

	PM (326 IAC 6-1-12) limit(s)		**SO2 (326 IAC 7-4-2)**	**limit(s)**
	#/MMBtu	**tons/yr**	**#/MMBtu**	**#/hr**
Boiler # 1	0.27	16.5	2.43	177.38

PM: emfac of 66.0 # / ton coal = 66 # / ton x lb coal / 12415 Btu x ton / 2000 # x 10^6 Btu / MMBtu = 2.6 # PM / MMBtu ** = need PM control
have multiclones for PM control & at least 90% control = 2.6 (1-.9) = 0.26 # / MMBtu

0.26 # / MMBtu x MMBtu / 10^6 Btu x 12415 Btu / lb coal x 25754 tons coal / yr x 2000/2000 x (1 - 0.9 eff) = 8.3 tons / yr

SO2: emfac of 38(S) # / ton = 38(1.57) # SO2 / ton coal x lb coal / 12415 Btu x ton / 2000 lbs x 10^6 Btu / MMBtu = 2.4 # SO2 / MMBtu
emfac at % sulfur is lower than allowable limit

2.4 # / MMBtu x 73 MMBtu / hr = 175.2 # SO2 / hr
lower than allowable pound per hour limit & 1.57 % S

Appendix A: Emissions Calculations
Industrial Boiler
Waste Oil

Emission Unit ID
B1 - Boiler # 1
Application withdrawn 07/20/99

Company Name: **Visteon Automotive Systems**
Address City IN Zip: **6900 English Avenue, Indianapolis, IN 46219**
CP:
Plt ID: **F097-6964-00021**
Reviewer: **M. Caraher**
Date: **07/21/99**

Heat Input Capacity MMBtu/hr:	Potential Throughput kgals/yr	S = Weight % S
73	0	0.38

Waste Oil firing capacity is 20.5% max

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	3.3	3.3	54.0 *(142S)*	20.0	0.2	5.0
Potential Emissions in pounds/hr	0.0	0.0	0.0	0.0	0.0	0.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0	0.0

Methodology
Coal firing burner max was 73 MMBtu/hr & waste oil is 15 MMBtu/hr burner: 15/73 x 100 = 20.5%
1 gallon of waste oil has a heating value of 138,000 Btu
Potential Throughput (kgal/yr) = Heat Input Capacity (MMBtu/hr) x (0.25) x 8760 hrs/yr x 1 kgal/1000 gal x 1 gal/0.138 MMbtu

Emission factors are from AP-42 Section 1.3 (Supplement E 9/98)
PM emissions are condensable and filterable PM
Emissions (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2000 lb/ton

Industrial Boilers
Waste oil
HAPs Emissions

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	BDL
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0

HAPs - Metals (continued)

	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	0.0	0.0	0.0	0.0

Methodology

No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

PM & SO2 Compliance Determination:

	PM (326 IAC 6-1-12) limit(s)		SO2 (326 IAC 7-4-2) limit(s)	
	#/MMBtu	tons/yr	#/MMBtu	#/hr
Boiler # 1	0.27	16.5	2.43	177.38

PM: emfac of 3.3 # PM / kgal = 3.3 # / kgal x kgal / 138 MMBtu = 0.02 # PM / MMBtu
0.02 # PM / MMBtu x 15 MMBtu / hr x 8760/2000 = 1.6 tons PM / yr

SO2: emfac of 142(S) # / kgal = 142(0.38) # SO2 / kgal x kgal / 138 MMBtu = 0.4 # SO2 / MMBtu
emfac at % sulfur is lower than allowable limit

0.4 # / MMBtu x 15 MMBtu / hr = 5.9 # SO2 / hr
lower than allowable pound per hour limit & 0.38 % S

Appendix A: Emissions Calculations
Piston Finish Grinding
Plant Wide Machining

Emission Unit ID PFG
Piston Finish Grinding
7 Units

and

Emission Unit ID
Plant Wide Miscellaneous
Maching

Company Name: **Visteon Automotive Systems**
Address City IN Zip CP: **6900 English Avenue, Indianapolis, IN 46219**
Plt ID: **F097-6964-00021**
Reviewer: **M. Caraher**
Date: **07/21/99**

Emission Unit ID PFG

Current C.O. # 0021-06	Condition	PM limit	PM10 limit	Limited PTE
Condition # 3	0.03 gr/dscf @ 8760 hrs/yr	0.03 gr/dscf	18.0 tons/yr	18.0

No Previous VOC limit in C.O's

Current C.O. # 0021-06	Condition	VOC usage (tons/yr)	VOC limit (tons/yr)	Limited PTE
None	None	13.1	13.1	13.1

Notes:
Source reports actual VOC emissions of 4.354 tons per year x 3 shifts = 13.1 tons per year
No emission factor given so use = emissions (2000 lbs VOC/ton used)
At 18,000 acfm for three CE's, 0.03 gr/dscf is equivalent to 4.6 lbs PM/hr
Sourcewide PTE to emit PM10 does not exceed 100 tons/yr

Plant Wide Miscellaneous VOC/HAP usage

No Previous VOC limit in C.O's

Current C.O. # 0021-06	Condition	VOC usage (tons/yr)	VOC limit (tons/yr)	Limited PTE
None	None	15.7	15.7	15.7

Notes:
Source reports actual VOC emissions of 5.246 tons per year x 3 shifts = 15.74 tons per year
No emission factor given so use = emissions (2000 lbs VOC/ton used)

No Previous HAP limit in C.O's

Current C.O. # 0021-06	Condition	HAP usage (tons/yr)	HAP limit (tons/yr)	Limited PTE
None	None	12.0	9.0	9.0

Notes:
Source reports actual HAP emissions of 3.994 tons per year of Diethyanolamine x 3 shifts = 11.982 tons per year
No emission factor given so use = emissions (2000 lbs HAP/ton used)
Combined HAPs sourcewide do not exceeed 25.0 tpy potential to emit

At a specific gravity of 1.092 (x 8.337) = 9.1 pounds per gallon
x gallons/yr x 9.1 lbs/gallon x ton/2000 pounds = 9.0 tons per year
x = 1978 gallons of diethanolamine limited throughput

Appendix A: Emissions Calculations
Cold Degreasing Dip Tanks

Emission Unit ID
Mineral Spirits Usage

Company Name: **Visteon Automotive Systems**
Address City IN Zip: **6900 English Avenue, Indianapolis, IN 46219**
CP:
Plt ID: **F097-6964-00021**
Reviewer: **M. Caraher**
Date: **07/21/99**

Current C.O. # 0021-06	Condition	Usage (gal)	Solvent Density (lbs/gal)	Tons VOC/yr	Limited PTE
Condition # 3	max anticipated annual solvent usage <	13200	7.43	49.0	49.0

check:
‹ ton/2000 lbs = 49.0 tpy

Insignificant Activity

Emission Unit ID's
Heat Treating
1 @ 2.5 MMBtu/hr max
combined = 16.7 MMBtu/hr

Appendix A: Emissions Calculations
Natural Gas Combustion Only
<100 MM BTU/HR
Heat Treating

Company Name: **Visteon Automotive Systems**
Address City IN Zip: **6900 English Avenue, Indianapolis, IN 46219**
CP:
Plt ID: **F097-6964-00021**
Reviewer: **M. Caraher**
Date: **06/07/99**

Heat Input Capacity MMBtu/hr:	Potential Throughput MMCF/yr:
2.5	22

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emissions in pounds/hr	0.0	0.0	0.0	0.3	0.0	0.2
Potential Emission in tons/yr	0.1	0.1	0.0	1.1	0.1	0.9

Heat Input Capacity MMBtu/hr:	Potential Throughput MMCF/yr:
16.7	146

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emissions in pounds/hr	0.1	0.1	0.0	1.7	0.1	1.4
Potential Emission in tons/yr	0.6	0.6	0.0	7.3	0.4	6.1

Methodology
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: Uncontrolled = 100, Manufacturer estimate = 100, Low NOx Burner = 50, Flue gas recirculation = 32
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3 (Supplement E 9/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.0021	0.0012	0.075	1.8	0.0034
Potential Emission in tons/yr	0.0	0.0	0.0	0.1	0.0
tons sum of all units	0.0	0.0	0.0	0.1	0.0

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.00038	0.0021
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0
tons sum of all units	0.0	0.0	0.0	0.0	0.0

Methodology is the same as above

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4. (Supplement E 9/98)

ach at Registration Level

Appendix A: Emissions Calculations
Internal Combustion Engines - Industrial Reciprocating
<447 kilowatts
Stationary Fire Pumps - Diesel Fuel Fired

Emission Unit ID's
Stationary Fire Pumps
1 @ 240 Horsepower
2 @ 265 Horsepower

Company Name: **Visteon Automotive Systems**
Address City IN Zip: **6900 English Avenue, Indianapolis, IN 46219**
CP:
Plt ID: **F097-6964-00021**
Reviewer: **M. Caraher**
Date: **06/07/99**

equivalent heat input MMBtu / hr	equivalent kilowatt hr		horsepower
0.67	197.7	fuel S = 0.4 pecent by weight	265

	PM	PM10	SOx	NOx	VOC	CO
Emission Factor lbs / MMBtu	0.3	0.3	0.3	4.4	0.4	1.0
Potential Emissions lbs / hr	0.2	0.2	0.2	3.0	0.2	0.6
tons / yr @ 500 hrs / yr	0.1	0.1	0.0	0.7	0.1	0.2
sum 2 units @ 500 hrs	0.1	0.1	0.1	1.5	0.1	0.3

equivalent heat input MMBtu / hr	equivalent kilowatt hr		horsepower
0.61	179.0	fuel S = 0.4 pecent by weight	240

	PM	PM10	SOx	NOx	VOC	CO
Emission Factor lbs / MMBtu	0.3	0.3	0.3	4.4	0.4	1.0
Potential Emissions lbs / hr	0.2	0.2	0.2	2.7	0.2	0.6
tons / yr @ 500 hrs / yr	0.0	0.0	0.0	0.7	0.1	0.1
tons sum 3 units	0.2	0.2	0.1	2.2	0.2	0.5

Methodology
AP-42 Appendix A Conversion Factor: 1 kilowatt hour = 3410 Btu
AP-42 Appendix A Conversion Factor: 1 horsepower = 2.5435E03 Btu

Equivalent kw hr rating: (max heat input MMBtu / hr) / (3410 Btu / kw hr)

Equivalent MMBtu/hr: horsepower x 2.5435E03 Btu/horsepower

Emission Factor (lbs / MMBtu): from AP-42 Table 3.3-2 Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines

Diesel fuel Btu: 137000 Btu/gal (per AP-42 Appendix A)

Potential Emissions (lbs / hr): emfac x heat input @2.7 # NOx / hr = 64.8 # NOx / day → ** requires registration

Potential Emissions (tons / yr): lbs / hr emissions x 500 operating hrs / yr x ton / 2000 lbs

if limited to: 500 annual operating hours, then 7116.8 gal/yr max annual combined diesel fuel consumption

diesel consumption gal/yr limitation: Combined MMBtu/hr / (Btu/gal / 10^6) * 500 hrs/yr

check: 7116.8 gal / yr * 0.137 MMBtu / gal x 4.4 # NOx / MMBtu x ton / 2000 = 2.2 tons NOx / yr

October 13, 1992
Certificate of Operation Limits
& June 1994 Exemption Letter

Appendix A: Emissions Calculations
Do current C.O. / Exemption Letter
limit FESOP PTE < 100 tpy?

Boiler # 2 & # 3: = 146 MMBtu/hr each Natural Gas

146 MMBtu/hr x 10^6 Btu/MMBtu x lb steam/1216 Btu x 8760/2000 → 525,888 tons steam/yr max production each boiler

400,000 tons steam per year equates to: 400,000 tons steam / yr x 2000 # / ton x 1216 Btu / lb steam x MMBtu / 10^6 Btu = 972, 800 MMBtu/yr

972,800 MMBtu / yr / 146 MMBtu = 6663 hours of operation at capacity or 972,800 MMBtu / yr / 1000 MMBtu / MMCF = 972.8 MMCF per year

Heat Input Capacity		Limited Throughput
MMBtu/hr:	MMCF/yr:	MMCF/yr:
146	1279	972.8

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	280.0	5.5	84.0
Potential Emissions in pounds/hr	0.8	0.8	0.1	31.1	0.6	9.3
Potential Emissions in tons/yr @ Limited MMCF throughput	3.7	3.7	0.3	136.2	2.7	40.9
Potential Emissions in tons/yr @ max MMCF per unit	4.9	4.9	0.4	179.1	3.5	53.7

Notes:
At 525, 888 tons steam/yr per unit max capacity > CP limit of 400,000 tons steam/yr/two units combined
At 972.8 MMCF/yr natural gas consumption & AP-42 emfac of 280 # NOx/MMCF; NOx emission rate exceeds 100 tpy (See above)
At 1279.0 MMCF/yr per unit natural gas consumption; NOx & CO combined (2 units) exceed 100 tpy (See above x 2)

Do Current C.O. / Exemption letter limit FESOP PTE < 100 tpy?	No	NOx @ 972.8 MMCF =	136.2	tons/yr

Hence:
1) must develop a NOx short term emission limit but keep steam production that source needs = 400000 tons steam/yr
2) NOx stack testing while burning gas on Feb 8 and 9 1995 showed NOx emissions of 0.15 #/MMBtu or 150 #/MMCF emfac
3) However short term NOx limit must be one source can demonstrate compliance with but still be under 100 tpy NOx (7.3 & 2.2 tpy from Insignificant Activities)
4) Arbitirarily chose 0.18 #/MMBtu or 180 # NOx/MMCF

Heat Input Capacity		Limited Throughput
MMBtu/hr:	MMCF/yr:	MMCF/yr:
146	1279	972.8

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	**180.0**	5.5	84.0
Potential Emissions in pounds/hr	0.8	0.8	0.1	20.0	0.6	9.3
Potential Emissions in tons/yr @ Limited MMCF throughput	3.7	3.7	0.3	**87.6**	2.7	40.9

October 13, 1992
Certificate of Operation Limits
& June 1994 Exemption Letter

Appendix A: Emissions Calculations
Do current C.O. / Exemption Letter
limit FESOP PTE < 100 tpy?

Boiler # 2 & # 3: = 146 MMBtu/hr each # 2 Fuel Oil

146 MMBtu/hr x 10^6 Btu/MMBtu x lb steam/1216 Btu x 8760/2000 → 525,888 tons steam/yr max production each boiler
400,000 tons steam per year equates to: 400,000 tons steam / yr x 2000 # / ton x 1216 Btu / lb steam x MMBtu / 10^6 Btu = 972, 800 MMBtu/yr
972,800 MMBtu / yr / 146 MMBtu = 6663 hours of operation at capacity or 972,800 MMBtu / yr x gal/0.140 MMBtu x kgal/ 1000 gal = 6948.6 kgal/yr

Heat Input Capacity		Limited Throughput	S = Weight % S
MMBtu/hr:	kgal/yr:	kgals/yr	
146	9135	6948.6	0.45

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	3.3	3.3	70.7 *(157S)*	24.0	0.2	5.0
Potential Emissions in pounds/hr	2.6	2.6	56.0	19.0	0.2	4.0
Potential Emission in tons/yr @ Limited kgal/yr	11.5	11.5	245.5	83.4	0.7	17.4
Potential Emissions in ton/yr @ max kgal/yr/unit	15.1	15.1	322.7	109.6	0.9	22.8

Notes:
At 525, 888 tons steam/yr per unit max capacity > CP limit of 400,000 tons steam/yr/two units combined
At 6948.6 kgal/yr # 2 fuel oil consumption; SO2 exceeds 100 tpy (See above)
At 9135.0 kgal/yr # 2 fuel oil; SO2 & NOx per unit and combined (2 units) exceed 100 tpy (See above, above x 2)

Do Current C.O. / Exemption letter limit FESOP PTE < 100 tpy?	No	SO2 @ 6948 kgals/yr =	245.5	tons/yr
	However	NOx @ 6948 kgals/yr =	83.4	tons/yr

Hence:
1) not major for NOx so no short term emission limit needed at steam production that source needs = 400000 tons steam/yr
2) NOx stack testing burning oil on Feb 8 and 9 1995 showed NOx emissions of 0.20 #/MMBtu or 28 #/kgal emfac which = 28 x 6948.6/2000 = 97.3 tpy NOx + Insignificant > 100 tpy
3) So, source cannot demonstrate compliance with an imposed NOx short term limit but give throughput limit to be under 100 tpy NOx (7.3 & 2.2 tpy from Insignificant Activities)

Heat Input Capacity		Limited Throughput	S = Weight % S
MMBtu/hr:	kgal/yr:	kgals/yr	
146	9135	6948.6	0.45

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	3.3	3.3	70.7 *(157S)*	**28.0**	0.2	5.0
Potential Emissions in pounds/hr	2.6	2.6	56.0	22.2	0.2	4.0
Potential Emission in tons/yr @ Limited kgal/yr	11.5	11.5	245.5	**97.3**	0.7	17.4
Potential Emissions in ton/yr @ max kgal/yr/unit	15.1	15.1	272.5	**127.9**	0.9	22.8

Emission Unit ID's
B2 - Boiler # 2
B3 - Boiler # 3

Company Name: **Visteon Automotive Systems**
Address City IN Zip: **6900 English Avenue, Indianapolis, IN 46219**
CP:
Plt ID: **F097-6964-00021**
Reviewer: **M. Caraher**
Date: **08/13/99**

Source has requested to burn natural gas or distillate fuel oil and requests to have minor (FESOP) source status
1) Potential to emit (both boilers combined - however, assume natural gas PTE already limited - see page 10 of 12):

Pollutant	Natural Gas tons/yr	Distillate oil tons/yr
PM/PM10	3.7	30.1
SO2	0.3	645.4
VOC	2.7	1.8
NOx	87.6	219.3
CO	40.9	45.7

2) Which pollutants are greater than 100 tpy and need to be limited ?
SO2 and NOx on distillate oil - but limiting SO2 will limit NOx

3) Limit fuel use but considering any other facilities PTE of that pollutant (SO2):
99.0 tpy - 0.1tpy from stationary fire pumps = 98.9 tpy allowed

98.9 tpy / 645.4 tpy x (9135 kgal/yr max consumption x 2 units) = 2799.7 kgals/yr

4) Now that we have established independent fuel use limits, we need to check how they relate to each other (as if source burned all fuel allowed under limit):

Pollutant	Natural Gas tons/yr	Distillate oil tons/yr
PM/PM10	3.7	5.5
SO2	0.3	98.9
VOC	2.7	0.3
NOx	87.6	46.4
CO	40.9	8.3

for SO2: 98.9 tpy - 0.3 tpy = 98.6 tpy allowed

"revised" fuel use limit:
98.6 tpy / 645.4 tpy x (9135 kgal/yr max consumption x 2 units) = 2791.2 kgals/yr

and the revised fuel use limit PTE table is:

Pollutant	Natural Gas tons/yr	Distillate oil tons/yr
PM/PM10	3.7	4.6
SO2	0.3	98.6
VOC	2.7	0.3
NOx	87.6	33.5
CO	40.9	7.0

5) Next look at how the NOx emissions from distillate oil will affect the natural gas use limit:
In this case, NOx from distillate consumption is substantial 46.3 + 33.5 > 100 tpy
To account for influence, utilize an equivalency ratio that will be written into the natural gas limit using emfacs

Fuel	NOx emfac
Natural gas	180 lb / MMCF
Distillate oil	28 lb / kgal

$$\frac{180 \text{ lb / MMCF}}{28 \text{ lb / kgal}} \rightarrow 6.4 \text{ kgal / MMCF}$$ **so every 1 MMCF reduction in gas use can be substituted for 6.4 kgal consumption**

check: [(972.8 MMCF/yr - 1 MMCF/yr) x 180 lb NOx/MMCF x ton/2000 lb] + (6.4 kgal x 28 lb/kgal x ton/2000 lb) = 87.55 tons NOx / yr
(oil) 2791.2 kgal/yr x 157(0.45) lbs SO2/kgal x ton/2000 lbs = 98.6 tons SO2/yr
(gas) 972.8 MMCF/yr x 180 lb NOx/MMCF x ton/2000 lbs = 87.6 tons NOx/yr